1 2 3	DESOUZA LAW OFFICES, a professional corp JACQUELINE DESOUZA, State Bar No.:133686 PAMELA F. ELLMAN, State Bar No.:164574 2397 Shattuck Avenue, Suite 202 Berkeley, CA 94704 Telephone: (510) 649-3420 Facsimile: (510) 649-1711	ooration
4	, ,	
5	Attorneys for Defendant(s): RWS ENTERPRISES WHICH WILL DO BUS	
6	IN CALIFORNIA AS KIDDIE KANDIDS, INC	
7		
8	UNITED STATES DISTRICT COURT	
9	NORTHERN DIST	RICT OF CALIFORNIA
10	JACQUELYN HARRIS, LORA MOTE, and	Case No. C 08-00852 PJH
11	COURTNEY COLIANNA, on behalf of themselves and all others similarly situated,	
12	·	STIPULATION OF THE PARTIES AND
13	Plaintiffs,	[PROPOSED] ORDER RE:
14	vs.	CONTINUANCE OF PLAINTIFFS' MOTION TO REMAND, AND CASE
15	RWS ENTERPRISES WHICH WILL DO	MANAGEMENT CONFERENCE TO
16	BUSINESS IN CALIFORNIA AS KIDDIE KANDIDS, INC, and DOES 1 through 50,	ALLOW THE PARTIES TO ENGAGE IN SETTLEMENT DISCUSSIONS
17	inclusive,	
18	Defendants.	Complaint Filed: January 4, 2008
19		Complaint Fried. January 4, 2000
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Stipulation Of The Parties And [Proposed] Order Re: Continuance Of Plaintiffs' Motion For Remand, And Case Management Conference

- Page 1

Pursuant to Northern District Local Rules, rule 6.2 and 7.12, the parties, by their attorneys of record, stipulate to continue Plaintiffs' Motion to Remand this Action to State Court for 30 days in order to continue their negotiations and settlement discussions. The Parties request that Plaintiffs' Motion to Remand presently set for May 7, 2008, be continued to May 21, 2008. The Parties further request that the deadlines for filing Defendant's opposition and Plaintiffs' reply papers are calculated, in accordance with Federal Rules of Civil Procedure, from the May 21<sup>st</sup> hearing date.

The Parties stipulated and obtained this court's consent to a prior 30-day continuance of Plaintiff's motion.

The Court has scheduled an initial Case Management Conference for May 15, 2008. The Parties request that this initial Case Management Conference be continued to June 5, 2008, to accommodate the Party's negotiations, the continued Motion for Remand, and the Federal Rules of Civil Procedure, rule 26 subdivision (f) requirements. The Parties will comply with the Court's Standing Order For All Judges Of The Northern District.

DATED: April 3, 2008 DESOUZA LAW OFFICES a professional corporation

Jacqueline deSouza
Attorneys for Defendant
RWS ENTERPRISES WHICH WILL DO
BUSINESS IN CALIFORNIA AS KIDDIE

KANDIDS, INC.

DATED: LAW OFFICES OF RANDALL CRANE

By: /s/ Randall Crane
Randall Crane
Attorneys for Plaintiffs
JACQUELYN HARRIS, LORA MOTE, and

COURTNEY COLIANNA, on behalf of themselves and all others similarly situated.

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1	Pursuant to the Parties' stipulation and Good Cause Appearing, this Court GRANTS the	
2	Parties' request for a continuance of Plaintiffs' Motion to Remand. The Plaintiffs' Motion shall be	
3	heard on May 21, 2008, at 9:00 am in Department 17 of this Court. Defendant's opposition and	
4	Plaintiffs' reply shall be calendared from the May 21, 2008 hearing date in accordance with the	
5	Federal Rules of Civil Procedure. The initial Case Management Conference shall be continued to Jun	
6	5, 2008, at 2:30 p.m.	
7	IT IS SO ORDERED:	
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9	DATED: April, 2008  By: The Hon. Phyllis J. Hamilton	
10	Judge of the United States District Court Northern District of California	
11	Northern District of Camorina	
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